

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

MICROSOFT CORPORATION,

Plaintiff,

v.

THE PARTNERSHIPS and
UNINCORPORATED ASSOCIATIONS
IDENTIFIED ON SCHEDULE “A”,

Defendants.

Case No. 24-cv-03255

Judge Sunil R. Harjani

Magistrate Judge Jeffrey Cole

**STIPULATION REGARDING ASSET RESTRAINT FOR DEFENDANTS BEAUSTAR,
DEARLOVEY, GETNAMENECKLACE, MYINFINITYS, AND ROSEINSIDE**

This Stipulation is made and entered into between Plaintiff Microsoft Corporation (“Plaintiff”) and Defendants Beaustar, dearlove, getnamenecklace, myinfinitys, and roseinside (“Defendant”).

WHEREAS, on April 23, 2024, Plaintiff filed the above-captioned lawsuit against the Defendants identified in Schedule A to the Complaint for alleged infringement of Plaintiff’s intellectual property [1];

WHEREAS, Plaintiff’s Complaint identifies Defendant as Defendants 177, 185, 191, 200, and 206 in Schedule A [2];

WHEREAS, on June 11, 2024, the Court entered Preliminary Injunction Order against Defendants in this case including Defendant [37];

WHEREAS, the Preliminary Injunction Order entered by the Court includes, among other things, provisions to restrain funds in Defendant’s linked financial accounts, including funds held by PayPal, and provisions to serve Expedited Discovery upon Defendant (*Id.* at ¶¶ 3, 5);

WHEREAS, Plaintiff and Defendant are engaged in negotiations to resolve this matter.

AGREEMENTS

NOW THEREFORE, the Parties below hereby stipulate and agree as follows:

1. PayPal shall continue to restrain ONE HUNDRED THOUSAND DOLLARS (\$100,000.00) of funds in the Defendant's PayPal accounts until final disposition of this case.
2. Upon service of a copy of this Stipulation, PayPal shall immediately lift any monetary restrains related to this Lawsuit in the Defendant's PayPal accounts, except for the \$100,000 restraint of funds in paragraph 1.
3. Defendant agrees not to use the \$100,000 restraint of funds in paragraph 1 to pay for any recurred charges or expenses, including but not limited to PayPal seller fees, shipping fees, and chargebacks.
4. Plaintiff's counsel shall serve a copy of this Stipulation to PayPal within one (1) Business day of its entry by the Court.
5. Defendant's Motion to Modify the Asset Restraint [50] remains pending and the Parties intend to fully brief it.

Date: July 18, 2024

Respectfully submitted,

/s/ Martin F. Trainor

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